

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

Chapter 11

Case No. 23-00623 (TJC)

Jointly Administered

Related to Docket No. 259

**STAFFING REPORT OF TONEYKORF PARTNERS, LLC FOR
THE PERIOD FROM MARCH 1, 2024 THROUGH MARCH 31, 2024**

In accordance with the *Order Authorizing Debtors to Retain ToneyKorf Partners, LLC as Interim Management of the Debtors, Effective as of the Petition Date Pursuant to Section 363 of the Bankruptcy Code, and Granting Related Relief* [Docket No. 259] (the “Retention Order”) and pursuant to the terms of the engagement letter dated March 30, 2023 (the “Engagement Letter”), ToneyKorf Partners, LLC (“ToneyKorf Partners”) hereby submits its staffing report (the “Staffing Report”) for the period of March 1, 2024 through March 31, 2024 (the “Staffing Period”), and in support of such report respectfully represents:

1. The Debtors appointed Mark E. Toney to serve as the Chief Restructuring Officer, James R. Porter to serve as the Chief Financial Officer, and Christopher P. Karambelas to serve as the Chief Information Officer and Chief Operating Officer as set forth in the Engagement Letter. The Engagement Letter further states that ToneyKorf Partners will provide additional personnel to assist Mr. Toney, Mr. Porter, and Mr. Karambelas with the restructuring efforts and other business of the Debtors (the “Temporary Staff”), as set forth more fully in the Engagement Letter.

2. The Retention Order provides that ToneyKorf Partners shall file with this Court a report of staffing on the engagement for the previous month and provide notice to the U.S. Trustee

and any official committee. *See* Retention Order, ¶ 3(c). Such report shall include the names of and functions filled by the individuals assigned. *See id.*

3. Attached hereto as **Exhibit A** is a list which includes the names of the ToneyKorf Partners personnel serving the Debtors during this Staffing Period, along with their corresponding functions.

Dated: April 19, 2024

/s/ Mark E. Toney

Mark E. Toney
Senior Managing Director
ToneyKorf Partners, LLC

EXHIBIT A

**ToneyKorf Partners, LLC
Staffing Report
March 1, 2024 – March 31, 2024**

Professional	Title	Function
Mark Toney	Senior Managing Director	<ul style="list-style-type: none"> – Chief Restructuring Officer – Oversees and leads aspects of the Debtors’ wind down and post-sale operations – Supports governing bodies (Boards) of the Debtors and affiliates – Leads the restructuring, asset sales, liability assessments, and planning of the Debtors – Participates in the development of the Plan of Liquidation and the Disclosure Statement, and related negotiations – Attends and coordinates negotiations with stakeholders and prepares for court hearings – Reviews and directs asset recovery and administrative claims analysis – Coordinates the sale process for the joint ventures, including due diligence, discussions with key parties, and coordinating review of the companies – Oversees and reviews cash management for disbursements and uses of cash for allocation between items pre- and post-transaction and the responsible party for the payments – Assists counsel with objections and litigations by key stakeholders – Oversees communications between the Debtors and certain stakeholders – Reviews workers’ compensation plans and coordinates strategy for wind down of the trust
James Porter	Managing Director	<ul style="list-style-type: none"> – Chief Financial Officer – Manages the Debtors’ financial and treasury functions, including coordinating cash flow efforts, overseeing budget and actual cash flow, and other needs as necessary – Provides oversight of bankruptcy reporting – Collaborates and supports the asset sale process of the remaining additional assets (accounts receivable, joint ventures, Real Estate) – Oversees, plans, and assists with certain aspects of the Debtors’ wind down and post-sale operations, including planning for the transition of revenue cycle follow up vendors – Oversees communication with Bondholders’, Unsecured Creditors’, and Pension Committee advisors and participates in the facilitated conference with the same parties regarding the Plan of Liquidation and Disclosure Statement negotiations – Analyzes Plan of Liquidation distribution

Professional	Title	Function
Christopher Karambelas	Managing Director	<ul style="list-style-type: none"> – Chief Information Officer / Chief Operating Officer – Oversees and leads the migration of emails to new Mercy estate tenant – Addresses bankruptcy-related contractual obligation issues with vendors, conducts analysis of contract rejections, conducts high-level review of filed claims – Oversees and leads the wind down of non-transitioning operational programs – Prepares non-transitioning assets for liquidation/sale – Assists with preparation of the liquidation analysis
Peg Brubaker	Director	<ul style="list-style-type: none"> – Vice President of Human Resources – Oversees wind down of human resources functions – Oversees wind down of benefit plans, including the defined benefit retirement plan, termination of the 401(k), 403(b) and 457(b) plans, health and dental insurance, disability insurance, and workers' compensation – Responds to defined benefit pension inquiries, provides and processes pension commencement requests – Verifies demographic data for defined benefit pension valuation
Jamy Houck	Director	<ul style="list-style-type: none"> – Manager of Administration and Communications – Assists, reviews, and edits communications to the press on behalf of the Debtors – Finalizes the monthly invoice for January 2024, the staffing report for February 2024, and the Compensation Report for December 2023 and January 2024
Dennis Rodriguez	Director	<ul style="list-style-type: none"> – Finance Manager – Supports bankruptcy-related matters, including claims analysis, contract rejection reviews, cure payment analysis, Plan of Liquidation analysis, and other financial and bankruptcy deliverables
Kara Borodkin	Paraprofessional	<ul style="list-style-type: none"> – Treasury and Finance Manager – Supports cash and liquidity management activities, including assisting with the preparation and maintenance of debtor-in-possession cash flow forecasts and variance analyses, and monitoring compliance with cash collateral requirements – Prepares various weekly, monthly, and ad hoc financial and operational reports, including bankruptcy MOR filings, budgeting, and cash flow reports, and assists with due diligence requests from other parties, including the UCC's financial advisors, Bondholder's advisors, and Buyer's advisors – Works on bankruptcy administration items, including §503(b)(9) claim review, vendor administrative expense reconciliations, and works with counsel on same